

## **REMARKS**

### **Introduction**

Applicant notes with appreciation the Examiner's indication that claim 9 would be allowable if rewritten in independent form.

Upon entry of the foregoing amendment, claims 1-42 are pending in the application. Claims 12-24 and 33-39 have been withdrawn from consideration. Claims 1, 25, 32, and 40-41 have been amended. No new matter is being presented. In view of the following remarks, reconsideration and allowance of all the pending claims are requested.

Entry of this Amendment After Final is proper under 37 C.F.R. §1.116 because the claim amendments: (a) place this application in condition for allowance (for the reasons discussed herein), (b) do not raise any new issues requiring further search and/or consideration (since the amendments amplify issues previously discussed throughout prosecution as indicated in the Final Office Action), (c) present the rejected claims in better form for consideration on appeal (should an appeal be necessary), and (d) are necessary and were not earlier presented because they are made in response to arguments raised in the Final Office Action.

Accordingly, for at least the reasons discussed above, entry of this Amendment is respectfully requested.

### **Rejection under 35 USC §102(b) to Meyer**

Claims 1-8 and 11 have been rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 6,239,817 to Meyer. Applicants respectfully request reconsideration and withdrawal of this rejection for at least the following reasons.

#### **Independent Claim 1**

Referring to independent claim 1, in the Office Action dated June 4, 2007, the Examiner alleges that Meyer discloses all the limitations recited in independent claim 1. In particular, the Examiner alleges that:

"Since the cockle beams have a dimension extending in the direction in which paper is fed, they extend in the paper feed direction. It may also be said that they extend in a direction opposite the paper feed direction. It simply depends on one's frame of reference because they extend in both the paper feed direction, and opposite the paper feed direction. The fact that the beams also extend in a direction perpendicular to the feed direction is irrelevant and does not preclude them from also extending in the paper feed direction, and a direction opposite the paper feed direction."

See Office Action of June 4, 2007, page 12, item 11.

However, Applicants respectfully disagree with the Examiner, since FIG. 2 of Meyer, as relied upon by the Examiner, clearly illustrates Meyer's cockle ribs 72-82 and 84-94 as extending only in a direction perpendicular to a paper-feeding direction from a wall lip 36. See FIGS. 2-3 of Meyer. In fact, since FIG. 2 is a zoomed-out perspective of Meyer's invention, FIG. 2 is an inadequate representation of Meyer's cockle ribs 72-82 and 84-94, and does not accurately show the manner in which Meyer's cockle ribs 72-82 and 84-94 protrude. FIG. 3, which is a zoomed-in version of Meyer's cockle ribs 72-82 and 84-94, more clearly illustrates that Meyer's cockle ribs 72-82 and 84-94 do not protrude at all from either of two walls 68 or 69 in a paper-feeding direction or a direction opposite to the paper feeding direction.

Furthermore, the only time Meyer mentions the manner in which the cockle ribs 72-82 and 84-94 protrude is in col. 3, lines 10-17 and col. 4, lines 42-48 of Meyer's specification, which respectively state "[t]he front set 35 and rear set 37 of cockle ribs extend sufficiently above the lip" and "the front set 35 of cockle ribs includes a plurality of equally spaced apart upstanding cockle ribs 84-94...". Accordingly, as shown by both Meyer's specification and FIG. 3, Meyer's cockle ribs 72-82 and 84-94 only protrude in a direction perpendicular to a paper feeding direction. Therefore, Meyer does not teach or disclose, among other things, "first and second support beams extending away from the first and second wall portions of the ink collector in the paper feed direction and in an opposite direction to the paper feed direction, respectively," as presently recited in independent claim 1.

It is well established that "[a] claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." Verdegaal Bros. v. Union Oil Co. of California, 814 F.2d 628, 631, 2 USPQ2d 1051,

1053 (Fed. Cir. 1987). The identical invention must be shown in as complete detail as contained in the...claim.” Richardson v. Suzuki Motor Co., 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). “The elements must be arranged as required by the claim...” In re Bond, 910 F.2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990). Accordingly, since Meyer does not teach or disclose all of the elements set forth in independent claim 1, this claim is patentably distinguishable from Meyer. Thus, Meyer cannot be properly used to reject independent claim 1 under 35 U.S.C. §102(b) as submitted in the Office action mailed on June 4, 2007, and withdrawal of this rejection and allowance of this claim are respectfully solicited.

#### **Dependent Claims 2-8 and 11**

With respect to claims 2-8 and 11, it is respectfully submitted that for at least the reason that claims 2-8 and 11 depend from independent claim 1, which is patentably distinguishable from Meyer for at least the reasons provided above, and therefore contain each of the features as recited in independent claim 1, dependent claims 2-8 and 11 are also patentably distinguishable from Meyer, and withdrawal of this rejection and allowance of these claims are respectfully solicited.

#### **Rejection under 35 USC §102(e) to Kodama**

Claims 1, 40 and 41 have been rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Publication No. 2005/0078147 A1 to Kodama et al. (hereinafter “Kodama”). Applicants respectfully request reconsideration and withdrawal of this rejection for at least the following reasons.

#### **Independent Claim 1**

Referring to independent claim 1, in the Office Action dated June 4, 2007, the Examiner alleges that Kodama discloses all the limitations recited in independent claim 1. In particular, the Examiner alleges that:

“Kodama states that element 3 is a hole. Element 3 is referred to because Element 3 clearly points to a side wall in the figure. One cannot have a hole without boundaries to define it, and in Kodama, walls form the boundaries of the hole/space portion, and a

rib extends from each wall, as clearly depicted in the figure.”

See Office Action of June 4, 2007, page 13, item 12.

However, referring to FIG. 22 of Kodama, as relied upon by the Examiner, even if Kodama were to be interpreted as including ribs 38 extending away from inside protuberances 14b, the ribs 38 still do not extend “in the paper feed direction and in an opposite direction to the paper feed direction, respectively,” as recited in independent claim 1. If anything, the ribs 38 extend from the inside of protuberances 14b in a scanning direction. Therefore, Kodama does not teach or disclose, among other things, “first and second support beams extending away from the first and second wall portions of the ink collector in the paper feed direction and in an opposite direction to the paper feed direction, respectively,” as presently recited in independent claim 1.

Additionally, referring to FIG. 23 of Kodama, the rib 38 of Kodama is illustrated protruding from a top portion of a tilt section 45. See paragraph 0258, lines 11-14 of Kodama. Even if the rib 38 can be interpreted as protruding from the top portion of the tilt section 45 in a paper feeding direction, Kodama does not teach or disclose, among other things, “second support beams extending away from the ... second wall portions of the ink collector in ... an opposite direction to the paper feed direction,” as recited in independent claim 1. In fact, there is no element extending from the tilt section 45 of Kodama (or any other wall in Kodama) in an opposite direction to the paper feed direction. Therefore, Kodama does not teach or disclose all the elements as recited in independent claim 1.

Accordingly, since Kodama does not teach or disclose all of the elements set forth in independent claim 1, this claim is patentably distinguishable from Kodama. Thus, Kodama cannot be properly used to reject independent claim 1 under 35 U.S.C. §102(b) as submitted in the Office action mailed on June 4, 2007, and withdrawal of this rejection and allowance of this claim are respectfully solicited.

#### **Independent Claim 40 and 41**

Referring to independent claims 40 and 41, in the Office Action dated June 4, 2007, the Examiner alleges that Kodama discloses all the limitations recited in independent claims 40 and 41. In particular, the Examiner alleges that:

"There are two sidewalls, each with a support beam that extends therefrom, as clearly shown in fig. 22."

See Office Action of June 4, 2007, page 13, item 12.

However, as stated above, referring to FIG. 22 of Kodama, as relied upon by the Examiner, even if Kodama were to be interpreted as including ribs 38 extending away from inside protuberances 14b, the ribs 38 still do not extend "in the paper feed direction" and "in an opposite direction to the paper feed direction," as recited in independent claims 40 and 41. If anything, the ribs 38 extend from the inside of protuberances 14b in a scanning direction. Therefore, Kodama also does not teach or disclose, among other things, "one or more first support beams extending away from the first opposing wall portion of the ink collector in a paper-feed direction partially across the defined space and one or more second support beams extending away from the second opposing wall portion of the ink collector in an opposite direction to the paper feed direction partially across the defined space" and "first and second support beams extending away from the first and second opposing wall portions of the ink collector in a paper-feed direction and an opposite direction to the paper feed direction, respectively, to segment the defined space of the ink collector without partitioning the defined space," as presently recited in independent claims 40 and 41, respectively.

Also as stated above, referring to FIG. 23 of Kodama, the rib 38 of Kodama is illustrated protruding from a top portion of a tilt section 45. See paragraph 0258, lines 11-14 of Kodama. Even if the rib 38 can be interpreted as protruding from the top portion of the tilt section 45 in a paper feeding direction, Kodama does not teach or disclose, among other things, "...one or more second support beams extending away from the second opposing wall portion of the ink collector in an opposite direction to the paper feed direction partially across the defined space" and "... second support beams extending away from the ... second opposing wall portions of the ink collector in ... an opposite direction to the paper feed direction, ... to segment the defined space of the ink collector without partitioning the defined space," as presently recited in independent claims 40 and 41, respectively. In fact, there is no element extending from the tilt section 45 of Kodama (or any other wall in Kodama) in an opposite direction to the paper feed direction. Therefore, Kodama does not teach or disclose all the elements as recited in independent claims 40 and 41.

Accordingly, since Kodama does not teach or disclose all of the elements set forth in independent claims 40 and 41, these claims are patentably distinguishable from Kodama. Thus, Kodama cannot be properly used to reject independent claims 40 and 41 under 35 U.S.C. §102(b) as submitted in the Office action mailed on June 4, 2007, and withdrawal of this rejection and allowance of these claims are respectfully solicited.

### **Rejection under 35 USC §102(b) to Matsushashi**

Claims 40-42 have been rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 5,997,129 to Matsushashi. Applicants respectfully request reconsideration and withdrawal of this rejection for at least the following reasons.

Referring to independent claims 40 and 41, in the Office Action dated June 4, 2007, the Examiner alleges that Matsushashi discloses all the limitations recited in independent claims 40 and 41. In particular, the Examiner alleges that:

“Applicant argues that the wall portions in Matsushashi are not opposing wall portions. However, the portion of wall 212a near each rib, is opposed to a portion of another wall portion of another rib, since it may be said that they are on opposite sides. For example, right most rib extends from a wall portion, while left most rib extends from a different wall portion, and the wall portions are opposed since they are opposite each other.”

See Office Action of June 4, 2007, page 13, item 13.

Even though Applicants disagree with the Examiner's interpretation of independent claims 40 and 41 with regard to the opposing wall portions, as stated in the Response to the Office Action dated December 15, 2006, Applicants have amended claims 40 and 41 to read “first and second opposing and upright wall portions to enclose a defined space to collect ink,” as presently recited. In other words, the language in claims 40 and 41 now recites “upright wall portions to enclose a defined space” (emphasis added). Accordingly, portions of bottom plate 212a of Matsushashi which are near each guide rib 214, as relied upon by the Examiner, are not the same as “upright wall portions to enclose a defined space,” as presently recited in independent claims 40 and 41 of Applicants' invention, because the bottom plate 212a is not

upright but flat on the ground. Furthermore, bottom plate 212a does not enclose a defined space, but instead provides the defined space therein. In fact, side walls 212b and 212e of Matsuhashi enclose a defined space, but the guide ribs 214 protrude from the bottom plate 212a and not from the side walls 212b and 212e. So even if the side walls 212b and 212e were referenced as allegedly reading on “upright wall portions to enclose a defined space,” as presently recited in independent claims 40 and 41, Matsuhashi would still fail to teach or disclose the claim language of “one or more first support beams extending away from the first opposing wall portion of the ink collector in a paper-feed direction partially across the defined space and one or more second support beams extending away from the second opposing wall portion of the ink collector in an opposite direction to the paper feed direction partially across the defined space” and “first and second support beams extending away from the first and second opposing wall portions of the ink collector in a paper-feed direction and an opposite direction to the paper feed direction, respectively, to segment the defined space of the ink collector without partitioning the defined space,” as presently recited in independent claim 40 and 41, respectively. Therefore, the fact that the side walls 212b and 212e of Matsuhashi enclose a defined space is a moot point and the side walls 212b and 212e of Matsuhashi do not read on the “upright wall portions,” as recited in independent claims 40 and 41, since nothing protrudes from the side walls 212b and 212e of Matsuhashi. Accordingly, Matsuhashi does not teach or disclose, among other things, “an ink collector positioned under paper to correspond to the nozzle unit and having first and second opposing and upright wall portions to enclose a defined space to collect ink,” as presently recited in independent claims 40 and 41.

Since Matsuhashi does not teach or disclose all of the elements set forth in independent claims 40 and 41, these claims are patentably distinguishable from Matsuhashi. Thus, Matsuhashi cannot be properly used to reject independent claims 40 and 41 under 35 U.S.C. §102(b) as submitted in the Office action mailed on June 4, 2007, and withdrawal of this rejection and allowance of these claims are respectfully solicited.

#### **Dependent Claim 42**

With respect to claim 42, it is respectfully submitted that for at least the reason that claim 42 depends from independent claim 41, which is patentably distinguishable from Matsuhashi for at least the reasons provided above, and therefore contains each of the features as recited in

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independent claim 41, dependent claim 42 is also patentably distinguishable from Matsuhashi, and withdrawal of this rejection and allowance of this claim are respectfully solicited.

Claims 25-29, 31 and 32 have also been rejected under 35 U.S.C. §102(b) as being anticipated by Matsuhashi. Applicants respectfully request reconsideration and withdrawal of this rejection for at least the following reasons.

### **Independent Claim 25**

Referring to independent claim 25, in the Office Action dated June 4, 2007, the Examiner alleges that Matsuhashi discloses all the limitations recited in independent claim 25. In particular, the Examiner alleges that:

"Applicant's argument that the guide ribs of Matsuhashi do not extend over the space at an upper portion of the ink collector is not persuasive. Any position above the bottom-most point of the ink collector is an upper portion. Since the guide ribs extend up into the space, they extend over the space at an upper portion of the ink collector."

See Office Action of June 4, 2007, page 14, item 13.

Even though Applicants disagree with the Examiner's interpretation of independent claim 25 with regard to the extension over the space at an upper portion of the ink collector, as stated in the Response to the Office Action dated December 15, 2006, Applicants have amended claim 25 to read "an ink collector having a first upright wall portion at a printing medium feed side of the ink collector and a second upright wall portion at a printing medium discharge side of the ink collector spaced-apart from each other and extending in a direction perpendicular to the printing medium to define a space to collect ink from the printing medium, a plurality of first support beams extending away from the first upright wall portion over the space at an upper portion of the ink collector in a printing medium feed direction to support the printing medium at the printing medium feed side of the ink collector, and a plurality of second support beams extending away from the second upright wall portion over the space at an upper portion of the ink collector in an opposite direction to the printing medium feed direction and alternately arranged with the plurality of first support beams to support the printing medium at the printing medium discharge side of the ink collector," (emphasis added) as presently recited.

Referring to FIG. 8 of Matsuhashi, as relied upon by the Examiner, a bottom plate 212a from which each guide rib 214 protrudes is not the same as “first support beams extending away from the first upright wall portion” and “second support beams extending away from the second upright wall portion,” as presently recited in independent claim 25, because the bottom plate 212a is not upright but flat on the ground. Furthermore, Matsuhashi has no element at all extending away from “a first upright wall at a printing medium feed side of the ink collector and a second upright wall portion at a printing medium discharge side of the ink collector,” as presently recited in independent claim 25, because nothing (including the guide ribs 214) protrudes from either of the two wall portions 212b and 212e).

Accordingly, Matsuhashi does not teach or disclose, among other things, “an ink collector having a first wall portion at a printing medium feed side of the ink collector and a second wall portion at a printing medium discharge side of the ink collector spaced-apart from each other and extending in a direction perpendicular to the printing medium to define a space to collect ink from the printing medium, a plurality of first support beams extending away from the first wall portion over the space at an upper portion of the ink collector in a printing medium feed direction to support the printing medium at the printing medium feed side of the ink collector, and a plurality of second support beams extending away from the second wall portion over the space at an upper portion of the ink collector in an opposite direction to the printing medium feed direction and alternately arranged with the plurality of first support beams to support the printing medium at the printing medium discharge side of the ink collector,” as presently recited in independent claim 25.

Since Matsuhashi does not teach or disclose all of the elements set forth in independent claim 25, this claim is patentably distinguishable from Matsuhashi. Thus, Matsuhashi cannot be properly used to reject independent claim 25 under 35 U.S.C. §102(b) as submitted in the Office action mailed on June 4, 2007, and withdrawal of this rejection and allowance of this claim are respectfully solicited.

### **Independent Claim 32**

Referring to independent claim 32, in the Office Action dated June 4, 2007, the Examiner alleges that Matsuhashi discloses all the limitations recited in independent claim 32. In particular, the Examiner alleges that:

"Applicant argues that the guide ribs 214 of Matsuhashi extend from the center of the bottom plate 212a and not on either a feed side or a discharge side of the ink collector. The guide ribs extend through the center, the upstream side, and the downstream side. Thus any guide rib may be selected and said to read on the limitation of a rib on a feed side, or a discharge side, since each guide rib extends over both sides and through the center."

See Office Action of June 4, 2007, page 14, item 13.

Similarly to independent claim 25 above, Applicants have amended claim 25 to read "a plurality of first support beams disposed within the space portion at a printing medium feed side of the ink collector extending in a printing medium feed direction from a first upright wall to support the printing medium above the space portion, and a plurality of second support beams disposed within the space portion at a printing medium discharge side of the ink collector and extending in an opposite direction to the printing medium feed direction from a second upright wall, the plurality of second support beams being overlapped by the plurality of first support beams to support the printing medium during feeding thereof between the ink head and the ink collector," (emphasis added) as presently recited.

Referring again to FIG. 8 of Matsuhashi, as relied upon by the Examiner, a bottom plate 212a from which each guide rib 214 protrudes is not the same as "a plurality of first support beams extending in a printing medium feed direction from a first upright wall" and "a plurality of second support beams extending in an opposite direction to the printing medium feed direction from a second upright wall," as presently recited in independent claim 32. In contrast, Matsuhashi is limited to the bottom plate 212a not being upright but flat on the ground, so the fact that the guide ribs 214 protrude from the bottom plate 212a is moot. There are no elements (including the guide ribs 214) which protrude from either the first or second upright walls.

Accordingly, Matsuhashi does not teach or disclose, among other things, "a plurality of first support beams disposed within the space portion at a printing medium feed side of the ink collector extending in a printing medium feed direction from a first upright wall to support the printing medium above the space portion, and a plurality of second support beams disposed within the space portion at a printing medium discharge side of the ink collector and extending in an opposite direction to the printing medium feed direction from a second upright wall, the

plurality of second support beams being overlapped by the plurality of first support beams to support the printing medium during feeding thereof between the ink head and the ink collector,” as presently recited in independent claim 32.

Since Matsuhashi does not teach or disclose all of the elements set forth in independent claim 32, this claim is patentably distinguishable from Matsuhashi. Thus, Matsuhashi cannot be properly used to reject independent claim 32 under 35 U.S.C. §102(b) as submitted in the Office action mailed on June 4, 2007, and withdrawal of this rejection and allowance of this claim are respectfully solicited.

#### **Dependent Claims 26-29 and 31**

With respect to claims 26-29 and 31, it is respectfully submitted that for at least the reason that claims 26-29 and 31 depend from independent claim 25, which is patentably distinguishable from Matsuhashi for at least the reasons provided above, and therefore contain each of the features as recited in independent claim 25, dependent claims 26-29 and 31 are also patentably distinguishable from Matsuhashi, and withdrawal of this rejection and allowance of these claims are respectfully solicited.

#### **Rejection under 35 USC §103 to Meyer in view of Matsuhashi**

Claim 10 is rejected under 35 U.S.C. §103(a) as being unpatentable over Meyer in view of Matsuhashi. This rejection is traversed for at least the reasons stated below.

As discussed above with reference to independent claim 1, Meyer does not teach or disclose, among other things “first and second support beams extending away from the first and second wall portions of the ink collector in the paper feed direction and in an opposite direction to the paper feed direction, respectively,” as presently recited in independent claim 1. Furthermore, the Examiner admits on page 10, item 8 of the Office Action dated December 15, 2006, that Meyer does not disclose “a second support beam with a round end portion,” as recited in claim 10 which is dependent from claim 1. Accordingly, the Examiner cites Matsuhashi as allegedly teaching the limitations not disclosed by Meyer. However, Applicants respectfully point out that Matsuhashi does not teach or suggest any of the features which are lacking in Meyer with respect to independent claim 1. In other words, Matsuhashi does not

teach or suggest, among other things, "first and second support beams extending away from the first and second wall portions of the ink collector in the paper feed direction and in an opposite direction to the paper feed direction, respectively," as presently recited in independent claim 1. as presently recited in independent claim 1. Therefore, Matsuhashi does not remedy the deficiencies of Meyer.

Since neither Meyer nor Matsuhashi, either separately or in combination with one another, teach or suggest each of the features as recited in claim 1, from which claim 10 depends, withdrawal of this rejection and allowance of claim 10 are earnestly solicited.

**Rejection under 35 USC §103 to Matsuhashi in view of Kobayashi**

Claim 30 is rejected under 35 U.S.C. §103(a) as being unpatentable over Matsuhashi in view of Kobayashi et al. (hereinafter "Kobayashi"). This rejection is traversed for at least the reasons stated below.

As discussed above with reference to independent claim 25, of which claim 30 ultimately depends, Matsuhashi does not teach or disclose, among other things, "an ink collector having a first wall portion at a printing medium feed side of the ink collector and a second wall portion at a printing medium discharge side of the ink collector spaced-apart from each other and extending in a direction perpendicular to the printing medium to define a space to collect ink from the printing medium, a plurality of first support beams extending away from the first wall portion over the space at an upper portion of the ink collector in a printing medium feed direction to support the printing medium at the printing medium feed side of the ink collector, and a plurality of second support beams extending away from the second wall portion over the space at an upper portion of the ink collector in an opposite direction to the printing medium feed direction and alternately arranged with the plurality of first support beams to support the printing medium at the printing medium discharge side of the ink collector," as presently recited in independent claim 25. Furthermore, the Examiner admits of page 11, item 9 of the Office Action dated June 4, 2007, that Matsuhashi does not disclose that "the space portion comprises a felt to absorb the ink drops caught by the space portion," as recited in claim 30, which is dependent from claim 25. Accordingly, the Examiner relies on Kobayashi as allegedly teaching the limitations

not disclosed by Matsuhashi. However, Applicants respectfully point out that Kobayashi does not teach or suggest any of the features which are lacking in Matsuhashi with respect to independent claim 25. In other words, Kobayashi does not teach or suggest, among other things, "an ink collector having a first wall portion at a printing medium feed side of the ink collector and a second wall portion at a printing medium discharge side of the ink collector spaced-apart from each other and extending in a direction perpendicular to the printing medium to define a space to collect ink from the printing medium, a plurality of first support beams extending away from the first wall portion over the space at an upper portion of the ink collector in a printing medium feed direction to support the printing medium at the printing medium feed side of the ink collector, and a plurality of second support beams extending away from the second wall portion over the space at an upper portion of the ink collector in an opposite direction to the printing medium feed direction and alternately arranged with the plurality of first support beams to support the printing medium at the printing medium discharge side of the ink collector," as presently recited in independent claim 25. Therefore, Kobayashi does not remedy the deficiencies of Matsuhashi.

Therefore, dependent claim 30 is patentable over both Matsuhashi and Kobayashi at least by virtue of its dependency on independent claim 25, which is allowable over both documents, and withdrawal of this rejection and allowance of this claim 30 are earnestly solicited.

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**Conclusion**

It is respectfully submitted that a full and complete response has been made to the outstanding Office Action and, as such, there being no other objections or rejections, this application is in condition for allowance, and a notice to this effect is earnestly solicited.

If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided below.

If any further fees are required in connection with the filing of this amendment, please charge the same to our Deposit Account No. 502827.

Respectfully submitted,

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